

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF GEORGIA  
MACON DIVISION**

<b>UNITED STATES OF AMERICA</b>	:	
	:	<b>CRIMINAL NO. 5:14-cr-6-MTT</b>
<b>vs.</b>	:	
	:	<b>VIOLATIONS: 18 U.S.C. 1349</b>
	:	
<b>Chasity Basely,</b>	:	
<b>Danyelle Newton,</b>	:	
<b>Essie Morgan,</b>	:	
<b>Krystle Odoms, and</b>	:	
<b>Teeneka Harris</b>	:	
	:	
<b>DEFENDANTS</b>	:	
<hr style="width: 40%; margin-left: 0;"/>	:	<b>INDICTMENT</b>

**THE GRAND JURY CHARGES:**

At all times relevant to this Indictment:

**Heath Care Benefit Program**

The American Family Life Assurance Company (AFLAC) is a privately owned company that provides supplemental accident and hospital insurance programs nationwide.

AFLAC was a "health care benefit program: as defined by Title 18, United States Code, Section 24(b).

AFLAC policy holders were able to file bills known as "claims" with AFLAC to obtain reimbursement for medical costs and monies for lost wages. The claim form to AFLAC was required to contain certain important information,

including: (a) the policy holder's name and policy number; (b) a description of the health care benefit, item, or service that was provided or supplied to the policy holder; (c) the date upon which the benefit, item, or service was provided or supplied to the policy holder; (d) the name of the physician or facility that provided the benefit, item, or service to the policy holder; (e) the signature of the physician that provided the benefit, item, or service to the policy holder; and (f) the true amount the benefit, item, or service cost. The claim forms were submitted electronically or hard copy.

When a claim was submitted to AFLAC, the policy holder certified that the contents of the form were "accurate and complete."

### **The Defendants**

Chasity Basely, Danyelle Newton, Essie Morgan, Krystle Odoms, and Teeneka Harris are all residents of the Middle District of Georgia.

## **COUNT ONE CONSPIRACY TO COMMIT HEALTH CARE FRAUD 18 U.S.C. 1349**

During a period beginning in or about February, 2009 and continuing through in or around September, 2011, in the Middle District of Georgia, and elsewhere, the defendants, Essie Morgan, Krystle Odoms, Danyelle Newton, Teeneka Harris, and Chasity Basely did knowingly and willfully combine, conspire, confederate and agree with each other and with J.E., whose identity is

known to the Grand Jury, and with others both known and unknown to the Grand Jury, to violate Title 18, United States Code, Section 1347, that is, to execute a scheme and artifice to defraud a health care benefit program affecting commerce, as defined in Title 18, United States Code, Section 24(b), that is, American Family Life Assurance Company (AFLAC), and to obtain, by means of materially false and fraudulent pretenses, representations, and promises, money and property owned by, and under the custody and control of, said health care benefit program, in connection with the delivery of and payment for health care benefits, items, and services.

#### **PURPOSE OF THE CONSPIRACY**

It was the purpose of the conspiracy for the defendants and conspirators to unlawfully enrich themselves by, among other things: (a) submitting and causing the submission of fraudulent claims to AFLAC; (b) concealing the submission of false and fraudulent claims to AFLAC; and (c) diverting the fraudulent proceeds for their personal use and benefit.

#### **MANNER AND MEANS OF THE CONSPIRACY**

The manner and means by which the defendants and co-conspirators sought to accomplish the purpose of the conspiracy included, among others, the following:

The Defendants obtained supplemental accidental and hospital insurance policies from AFLAC.



To further the scheme, Defendants and co-conspirators created false hospital, medical and physician records. Co-conspirators also falsified physician signatures on these records.

Conspirators transmitted these records to AFLAC, which relied on these records in determining payment. Based on these false and fraudulent claims, AFLAC issued payments and Defendants received the following amounts from AFLAC, as shown in the attached chart:

Beginning in October, 2008 and continuing through September, 2011, defendants and their co-conspirators submitted over 30 claims to AFLAC for payment. The below table outlines the claim date and amount paid to the Defendants on each claim:

<b>Basely</b>	10/8/2009	\$400.00
	11/20/2009	\$3,000.00
	12/28/2009	\$400.00
	3/29/2010	\$2,300.00
	3/29/2010	\$2,300.00
	5/6/2010	\$3,445.00
	5/13/2010	\$300.00
	6/16/2010	\$800.00
	8/5/2010	\$5,905.00
	10/15/2010	\$1,991.25

<b>Newton</b>	11/19/2009	\$1,050.00
	3/29/2010	\$2,470.00
	6/30/2010	\$2,225.00
	10/14/2010	\$4,245.00

<b>Morgan</b>	4/16/2009	\$200.00
	7/10/2009	\$500.00
	7/15/2009	\$1,110.00
	6/17/2010	\$2,500.00
	9/3/2010	\$850.00
	11/5/2010	\$3,245.00

<b>Odoms</b>	12/21/2009	\$1,820.00
	9/17/2010	\$3,045.00
	11/5/2010	\$1,770.00

<b>Harris</b>	6/8/2009	\$700.00
	9/4/2009	\$185.00
	11/2/2009	\$2,320.00
	4/12/2010	\$3,475.00
	6/3/2010	\$2,445.00
	6/24/2010	\$620.00
	8/3/2010	\$2,055.00
	10/5/2010	\$3,550.00

Once payment was made by AFLAC, Defendants deposited the AFLAC fraud proceeds into their respective bank accounts, and subsequently used the money to unjustly enrich themselves.

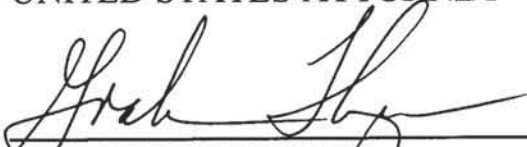
All in violation of Title 18, United States Code, Section 1349, in connection with 18 United States Code, Section 1347.

A TRUE BILL.


S/FOREPERSON OF THE GRAND JURY

Presented by:

MICHAEL J. MOORE  
UNITED STATES ATTORNEY

  
\_\_\_\_\_  
GRAHAM A. THORPE  
ASSISTANT UNITED STATES ATTORNEY

Filed in open court this 11th day of February, AD 2014.

  
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Deputy Clerk